



JOHN J. GIBBONS FELLOWSHIP IN
PUBLIC INTEREST & CONSTITUTIONAL LAW

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VIA CMECF

Honorable Richard Sullivan
United States District Judge
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

**Re: *Everytown v. Bureau of Alcohol, Tobacco, and Firearms*, 15-cv-5791
(RJS)**

Dear Judge Sullivan,

On behalf of the parties, I write in response to the Court's Order, dated January 26, 2016 (Dkt. No. 21), requiring that a status update be provided by today's date. As we have reported in past updates, the parties have been making substantial progress in their negotiations. In the last 30 days, the parties concluded their negotiations, and reached a proposed resolution that must be reduced to writing. The proposed agreement will then be subject to Department of Justice and Bureau of Alcohol, Tobacco and Firearms approval.

The parties therefore respectfully request an additional thirty (30) days to document and potentially approve the resolution of this case. If this request is granted, the parties will either submit a proposed stipulation and order by March 24, 2016, or will update the Court on the status of the matter.

Thank you for your kind consideration of this request.

Respectfully submitted,

/s/ Ana Muñoz
Ana Muñoz
Gibbons P.C.

Cc: Louis Pellegrino, Assistant United States Attorney
Counsel for Defendants